

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

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| IN RE: REVIEW OF COGENERATION AND SMALL POWER PRODUCTION RULES [199 IAC CHAPTER 15] | DOCKET NO. RMU-2016-0006 |
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**IPL REPLY TO COMMENTS ON PROPOSED RULE CHANGES FOR
CHAPTER 15**

Interstate Power and Light Company (IPL), by and through undersigned counsel, submits reply comments in response to stakeholder comments submitted on the Order Requesting Stakeholder Comment on Proposed Rule Change issued by the Iowa Utilities Board (Board) in this docket on July 19, 2016.

SUMMARY

On August 18, 2016, the Iowa Association of Electric Cooperatives (IAEC), MidAmerican Energy Company (MidAmerican), the Office of Consumer Advocate (OCA), the Environmental Law & Policy Center (ELPC), and the Iowa Environmental Council (IEC) submitted comments in this docket. IPL also submitted comments on IAC Chapter 15 on August 18, 2016.

IPL has reviewed the comments submitted by stakeholders and respectfully submits the following response:

Information to board. 199 IAC 15.3

In their respective comments, both MidAmerican and OCA commented on the Board's proposed changes to change the current bi-annual filing requirements in

this section to a single informational filing that will be submitted along with the annual report required under 199 IAC 23. As stated in IPL's filing, IPL supports the Board's proposed change and believes this change promotes efficiency and clarity. In its filing, MidAmerican appropriately identified the relationship between 199 IAC 45 and 199 IAC 15 proposed changes and discussed concerns that changes to 199 IAC 45 rules would require electric utilities to file information on a non-confidential basis. IPL supports MidAmerican's comments and concerns with respect to confidentiality and reiterates here the importance of preserving the utility's ability to protect customer information and file confidentially information that serves no public purpose.

Electric utility annual reporting requirement regarding AEP facilities. 199 IAC 15.12

In its comments, ELPC proposed additional details to be filed regarding distributed generation facilities and in accordance with proposed changes to 199 IAC 45. While IPL does not oppose the filing of these additional details, should the Board adopt these details, IPL recommends the following edits be considered for the purposes of clarity:

The information to be reported shall include:

- a. The date when the application was received as complete;*
- b. The total AC nameplate capacity and fuel type of the distributed generation facility;*
- c. The level of review received (Level 1, Level 2, Level 3, or Level 4), and whether the project failed any initial review screens (and if so and readily*

determinable, which screens], whether the project received supplemental review, and whether any impact study and/or facility study was conducted; and

d. Whether the interconnection was approved, denied or withdrawn and the date of such action.

e. Whether the distributed generation facility was constructed and began operation and, if so, ~~the date the facility began operation~~ the date the distributed generation facility was authorized by the electric utility to begin operation.

Each electric utility shall include a summary as part of the report that provides aggregate information on the pre-application reports and interconnections requests and distributed generation that has been interconnected in the electric utility's service territory including distributed generation capacity added in the previous calendar year by fuel type and total distributed generation capacity operating in the electric utility's service territory by fuel type.

CONCLUSION

IPL appreciates the Board's and the Board Staff's efforts in updating its rules. IPL submits these Reply Comments in order to aid the Board in addressing any additional areas that may need refining and to promote clarification of certain provisions to support timely and accurate implementation and compliance.

WHEREFORE, Interstate Power and Light Company respectfully requests that the Iowa Utilities Board give due consideration to IPL's Reply Comments regarding the 199 IAC Chapter 15 cogeneration and small power production rules.

DATED this 2nd day of September, 2016.

Respectfully submitted,

**INTERSTATE POWER AND LIGHT
COMPANY**

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